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5 Rene Acevedo

FILED

JUL 10 2009

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,)

CASE NO. CR-09-00633 JF

12 Plaintiff,)

13 v.)

**JOINT STIPULATION AND
[PROPOSED] ORDER MODIFYING
TRAVEL RESTRICTIONS**

14 RENE ACEVEDO,)

15 Defendant.)
16

17 The United States of America, by Grant Fondo, Assistant United States Attorney, and
18 the defendant in the above case, by and through his attorney Alfredo M. Morales, hereby enter
19 into this joint stipulation to modify the defendant's travel restrictions.

20 1. Defendant Rene Acevedo is currently released pursuant to this Court's
21 Order on a Fifty Thousand Dollar [\$50,000.00] unsecured bond.

22 2. In addition to the above, Defendant Rene Acevedo is prohibited from traveling outside
23 the Northern District of California. Through this Stipulation, Defendant Acevedo
24 seeks the approval of the Court to travel outside the Northern District of California for purposes
25 of his employment. Specifically he is seeking permission to travel to the cities of Modesto,
26 Stockton, and San Bernardino, California due to employment obligations. Defendant plans to
27 travel by vehicle. Defendant is a produce manager for Sigma Foods and his job requires
28 that he go to the above cities on certain days of the week.

1 3. The United States does not object to this proposed modification, provided that Pretrial
2 Services is informed of the specific dates, times and places the defendant is traveling outside the
3 Northern District of California.

4 4. Jaime Carranza from Pretrial Services has indicated that he has no objection to
5 Defendant Acevedo traveling outside the Northern District of California to the aforementioned
6 cities provided the Defendant informs him of the specific dates, times and places that he intends
7 to travel and that the travel be limited to purposes of employment and to said cities.

8 5. Both sides therefore stipulate and request that the court modify Defendant Acevedo's
9 travel restrictions as follows:

10 1. That Defendant Acevedo be permitted to travel outside the Northern District of
11 California to Modesto, Stockton and San Bernardino for purposes of his employment only.

12 2. That all other conditions of Defendant Acevedo's release remain the same.

13
14 IT IS SO STIPULATED:

15
16 Dated: July 8, 2009

/s/ _____
GRANT FONDO, ESQ.
Assistant United States Attorney

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18
19 Dated: July 8, 2009

/s/ _____
ALFREDO M. MORALES, ESQ.
Attorney for Defendant Acevedo

